



**BOULT • CUMMINGS
CONNERS • BERRY_{PLC}**

*03 FEB 13 PM 1:14

April A. Ingram
(615) 252-2302
Fax: (615) 252-6302
Email: aingram@boultcummings.com

February 13, 2003

IN REGULATORY AUTHORITY
DOCKET ROOM

VIA HAND DELIVERY

Mr. Joe Werner
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: CLEC Application of Granite Telecommunications, LLC
Docket No. 03-00068

Dear Mr. Werner:

Granite Telecommunications, LLC ("Granite") has received your letter of February 4, 2003, requesting further information pertaining to their Application for a Certificate of Convenience and Necessity. Granite offers the following responses to the requests you have made.

1. **The following Toll Dialing Parity Plan Requirement information is required to be submitted to the Authority: a) state whether a PIC change charge waiver period is proposed and for how long; b) provide anti-slamming procedures for your plan; c) provide statement(s) concerning nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listings.**

Response: A new draft Toll Dialing Parity Plan is attached as Exhibit A, including the information requested above.

2. **Identify any special Customer Premise Equipment (CPE) requirements that would not be compatible with an incumbent carrier.**

Response: Granite requires that all customer premise equipment be compatible with the incumbent carrier.

3. **Include a statement that the carrier will comply with all rules of the FCC and the TRA.**

Response: Granite will comply with all rules of the FCC and TRA.

4. **Identify all complaints filed with state and federal regulatory agencies involving your Company or affiliated entities, and identify the nature of the complaint, which governmental agency or office received the complaint, and how the complaint was resolved.**

Response: Granite has no affiliated companies. Granite is not aware of any complaints filed against it with state or federal regulatory agencies.

5. **Please specify the type of state certification for the listed states in the application such as facilities based or resale certification.**

Response: Granite is authorized to provide UNE-P based and non-facilities based local exchange service and non-facilities based interexchange telecommunications service in the following states: Alabama, Florida, Georgia, Kentucky, Massachusetts, Maine, Maryland, Mississippi, North Carolina, New Hampshire, New Jersey, New York, Rhode Island, South Carolina and Vermont.

We trust this addresses your questions on the application. If you have questions regarding this matter, or if you require additional information, please give me a call at 252-2302.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC



By:
April A. Ingram

AAI/aai

cc: Stacey Klinzman, Miller Isar, Inc.
Geoff Cookman, Granite Telecommunications, LLC

EXHIBIT A

REVISED TOLL DIALING PARITY PLAN
(Attached)

GRANITE TELECOMMUNICATIONS, LLC INTRALATA TOLL DIALING PARITY IMPLEMENTATION PLAN

Pursuant to the Federal Communications Commission ("FCC") Order 99-54 in CC Docket No. 96-98 (Implementation of the Local Competition Provisions of the Telecommunications Act of 1996) Granite Telecommunications, LLC ("Granite") hereby submits its IntraLATA Toll Dialing Parity (1+ presubscription) Implementation Plan ("Plan").

I. Objective/Purpose

Granite seeks authority from the TRA to provide telecommunications services within the State of Tennessee as an interexchange carrier and as a competing local provider ("CLP").

Granite's Implementation Plan would enable Customers to route intraLATA toll calls (intraLATA 1+ and 0+ calls), plus directory assistance (1+ area code + 555-1212), without the use of access codes, to the Customer's pre-selected interexchange carrier (IXC).

II. Geographic Availability

IntraLATA presubscription ("ILP") is available in all LATAs where Granite will provide its local resold and UNE-P based telecommunications services within the State of Tennessee. ILP will be available in all exchanges of the underlying local exchange carrier where Granite provides local resale and UNE-P based services.

III. Implementation Schedule

Granite intends to offer dialing parity for intraLATA toll calls upon the later of: (i) 30 days after the TRA approves Granite's Plan; or (ii) the commencement of the provision of local exchange service. Initially, Granite will be offering exchange services as a reseller and UNE-P based provider, and will rely upon the capabilities of the underlying incumbent local exchange company ("ILEC") to provide intraLATA toll dialing parity. Accordingly, Granite's retail customers may choose any IXC that has established itself as an access customer under the underlying ILEC's access tariff.

IV. Carrier Selection Process

Granite will implement full 2-PIC ("Primary Interexchange Carrier") capability for interLATA and intraLATA presubscription. The full 2-PIC methodology allows customers to presubscribe to one carrier for intraLATA toll calls, and to the same or a different carrier for interLATA toll calls.

Granite will ensure that new customers have the opportunity to choose their intraLATA toll carrier. Granite employees who communications with the public, accept orders and serve in customer service capacities will explain the availability of 2-PIC equal access and intraLATA

toll dialing parity. Such employees will also assist customers in making an initial PIC choice, or in changing a PIC choice for intraLATA and interLATA toll calls.

A. Existing Customers

Granite has no existing local exchange customers in Tennessee.

B. New Customers

A new customer contacting Granite to request new local telephone exchange service will be advised of the opportunity to choose both an intraLATA and interLATA toll provider. If requested by the customer, Granite will provide a competitively neutral list of participating telecommunications carriers that provide intraLATA toll service in the customer's exchange. A new customer who does not select an intraLATA toll carrier will be identified as "no-PIC," and will not be automatically defaulted to a carrier. A "no-PIC" customer will be unable to make intraLATA toll calls on a 1+ or 0+ dialed basis, and will be required to dial the access code of a carrier (101XXXX) to place intraLATA toll calls until the customer chooses an intraLATA toll carrier. New customers will have thirty (30) calendar days following completion of the service request to make a PIC choice without charge.

V. Carrier Notification

IXCs will be notified via letter that they must contact Granite directly if an end-user using Granite's resold or UNE-P based services desires to change to that IXC. Granite will obtain a list of current IXCs from the TRA for mailing to all currently certificated IXCs. As a reseller, Granite will not have any access services or carrier customers in Tennessee who need to be informed of the availability of dialing parity. Should Granite provide access services as a UNE-P or facilities-based provider, Granite's access carrier customers will be informed of the availability of dialing parity.

VI. PIC Change Charges

The charge for a PIC change will be stated in Granite's tariff, and will be filed with the TRA.

VII. Anti Slamming Procedures

Granite will establish procedures for handling PIC change orders consistent with TRA requirements. Granite will work with IXCs and any customer who has been slammed in order to quickly resolve any disputes. Granite will ensure that the customer's PIC selection is changed back to its carrier of choice, without charge to the customer, as soon as possible.

VIII. Non-Discriminatory Access

Granite will provide non-discriminatory access to customers for telephone numbers, operators services, directory assistance and directory listings.